

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HOAI NGO,

Plaintiff.

Case No.: 17 Civ. 1727 (GHW)

-against-

OPPENHEIMER & CO., INC.

Defendant.

DECLARATION OF VALDI LICUL IN
SUPPORT OF PLAINTIFF'S MOTION
TO VACATE ARBITRATION AWARD

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VALDI LICUL, under penalty of perjury, affirms and states as follows:

1. I am a member of the law firm of Vladeck, Raskin & Clark, P.C., attorneys for plaintiff Hoai Ngo. I submit this Declaration in support of his motion to vacate the Arbitration Award in the matter of Ngo, Hoai vs. Oppenheimer & Co., Inc., JAMS Ref No. 1425025377 entered June 20, 2019.

2. Attached as Exhibit A is a true and correct copy of the underlying Arbitration Award, dated May 20, 2019. The parties received this Award on June 20, 2019.

3. Attached as Exhibit B is a true and correct copy of Ngo's Statement of Claim in the underlying arbitration, dated December 14, 2017.

4. Attached as Exhibit C is a true and correct copy of Defendant's Answer to Ngo's Statement of Claim, dated March 1, 2018.

5. Attached as Exhibit D is a true and correct copy of Ngo's Post-Hearing Memorandum of Law, dated April 5, 2019.

6. Attached as Exhibit E is a true and correct copy of Oppenheimer's Post-Hearing Memorandum of Law, dated April 5, 2019.

7. Attached as Exhibit F is a true and correct copy of Ngo's Post-Hearing Reply Memorandum of Law, dated April 12, 2019.

8. Attached as Exhibit G is a true and correct copy of Oppenheimer's Post-Hearing Reply Memorandum of Law, dated April 12, 2019.

9. Attached as Exhibit H is a true and correct copy of the transcript of the hearing in the underlying arbitration held March 4, 2019 through March 7, 2019.

10. Attached as Exhibit I is a true and correct copy of joint hearing Exhibit 1(a).

11. Attached as Exhibit J is a true and correct copy of joint hearing Exhibit 1(b).

12. Attached as Exhibit K is a true and correct copy of joint hearing Exhibit 1(c).

13. Attached as Exhibit L is a true and correct copy of joint hearing Exhibit 2.

14. Attached as Exhibit M is a true and correct copy of joint hearing Exhibit 3.

15. Attached as Exhibit N is a true and correct copy of joint hearing Exhibit 8.

16. Attached as Exhibit O is a true and correct copy of joint hearing Exhibit 9.

17. Attached as Exhibit P is a true and correct copy of joint hearing Exhibit 11(a).

18. Attached as Exhibit Q is a true and correct copy of joint hearing Exhibit 11(d).

19. Attached as Exhibit R is a true and correct copy of joint hearing Exhibit 11(e).

20. Attached as Exhibit S is a true and correct copy of joint hearing Exhibit 11(f).

21. Attached as Exhibit T is a true and correct copy of joint hearing Exhibit 11(g).

22. Attached as Exhibit U is a true and correct copy of joint hearing Exhibit 11(h).

23. Attached as Exhibit V is a true and correct copy of joint hearing Exhibit 11(i).

24. Attached as Exhibit W is a true and correct copy of joint hearing Exhibit 12(b).

25. Attached as Exhibit X is a true and correct copy of joint hearing Exhibit 12(c).

26. Attached as Exhibit Y is a true and correct copy of joint hearing Exhibit 12(d).

27. Attached as Exhibit Z is a true and correct copy of joint hearing Exhibit 12(e).
28. Attached as Exhibit AA is a true and correct copy of joint hearing Exhibit 12(f).
29. Attached as Exhibit BB is a true and correct copy of joint hearing Exhibit 13.
30. Attached as Exhibit CC is a true and correct copy of joint hearing Exhibit 15.
31. Attached as Exhibit DD is a true and correct copy of joint hearing Exhibit 16.
32. Attached as Exhibit EE is a true and correct copy of joint hearing Exhibit 17.
33. Attached as Exhibit FF is a true and correct copy of joint hearing Exhibit 18.
34. Attached as Exhibit GG is a true and correct copy of joint hearing Exhibit 19.
35. Attached as Exhibit HH is a true and correct copy of joint hearing Exhibit 20.
36. Attached as Exhibit II is a true and correct copy of joint hearing Exhibit 26.
37. Attached as Exhibit JJ is a true and correct copy of joint hearing Exhibit 27.
38. Attached as Exhibit KK is a true and correct copy of joint hearing Exhibit 28.
39. Attached as Exhibit LL is a true and correct copy of joint hearing Exhibit 29.
40. Attached as Exhibit MM is a true and correct copy of joint hearing Exhibit 30.
41. Attached as Exhibit NN is a true and correct copy of joint hearing Exhibit 32.
42. Attached as Exhibit OO is a true and correct copy of joint hearing Exhibit 33.
43. Attached as Exhibit PP is a true and correct copy of joint hearing Exhibit 34.
44. Attached as Exhibit QQ is a true and correct copy of joint hearing Exhibit 36.
45. Attached as Exhibit RR is a true and correct copy of joint hearing Exhibit 39.
46. Attached as Exhibit SS is a true and correct copy of joint hearing Exhibit 45.
47. Attached as Exhibit TT is a true and correct copy of joint hearing Exhibit 48.
48. Attached as Exhibit UU is a true and correct copy of joint hearing Exhibit 50.
49. Attached as Exhibit VV is a true and correct copy of joint hearing Exhibit 51.

50. Attached as Exhibit WW is a true and correct copy of joint hearing Exhibit 52.
51. Attached as Exhibit XX is a true and correct copy of joint hearing Exhibit 53.
52. Attached as Exhibit YY is a true and correct copy of joint hearing Exhibit 55.
53. Attached as Exhibit ZZ is a true and correct copy of joint hearing Exhibit 56.
54. Attached as Exhibit AAA is a true and correct copy of joint hearing Exhibit 59.
55. Attached as Exhibit BBB is a true and correct copy of joint hearing Exhibit 60.
56. Attached as Exhibit CCC is a true and correct copy of joint hearing Exhibit 70.
57. Attached as Exhibit DDD is a true and correct copy of joint hearing Exhibit 72.
58. Attached as Exhibit EEE is a true and correct copy of joint hearing Exhibit 79.
59. Attached as Exhibit FFF is a true and correct copy of joint hearing Exhibit 80.
60. Attached as Exhibit GGG is a true and correct copy of joint hearing Exhibit 85.
61. Attached as Exhibit HHH is a true and correct copy of joint hearing Exhibit 86(b).
62. Attached as Exhibit III is a true and correct copy of joint hearing Exhibit 90.
63. Attached as Exhibit JJJ is a true and correct copy of joint hearing Exhibit 91.
64. Attached as Exhibit KKK is a true and correct copy of joint hearing Exhibit 95.
65. Attached as Exhibit LLL is a true and correct copy of joint hearing Exhibit 96.
66. Attached as Exhibit MMM is a true and correct copy of joint hearing Exhibit 97.
67. Attached as Exhibit NNN is a true and correct copy of joint hearing Exhibit 98.
68. Attached as Exhibit OOO is a true and correct copy of joint hearing Exhibit 99.
69. Attached as Exhibit PPP is a true and correct copy of joint hearing Exhibit 102.
70. Attached as Exhibit QQQ is a true and correct copy of joint hearing Exhibit 104.
71. Attached as Exhibit RRR is a true and correct copy of joint hearing Exhibit 105.
72. Attached as Exhibit SSS is a true and correct copy of joint hearing Exhibit 107.

- 73. Attached as Exhibit TTT is a true and correct copy of joint hearing Exhibit 109.
- 74. Attached as Exhibit UUU is a true and correct copy of joint hearing Exhibit 110.
- 75. Attached as Exhibit VVV is a true and correct copy of joint hearing Exhibit 111.
- 76. Attached as Exhibit WWW is a true and correct copy of joint hearing Exhibit 112.
- 77. Attached as Exhibit XXX is a true and correct copy of joint hearing Exhibit 113.
- 78. Attached as Exhibit YYY is a true and correct copy of joint hearing Exhibit 114.
- 79. Attached as Exhibit ZZZ is a true and correct copy of joint hearing Exhibit 116.
- 80. Attached as Exhibit AAAA is a true and correct copy of joint hearing Exhibit 121.
- 81. Attached as Exhibit BBBB is a true and correct copy of joint hearing Exhibit 122.
- 82. Attached as Exhibit CCCC is a true and correct copy of joint hearing Exhibit 124.
- 83. Attached as Exhibit DDDD is a true and correct copy of joint hearing Exhibit 125.
- 84. Attached as Exhibit EEEE is a true and correct copy of joint hearing Exhibit 126.
- 85. Attached as Exhibit FFFF is a true and correct copy of joint hearing Exhibit 127.
- 86. Attached as Exhibit GGGG is a true and correct copy of joint hearing Exhibit 128.
- 87. Attached as Exhibit HHHH is a true and correct copy of joint hearing Exhibit 131.
- 88. Attached as Exhibit IIII is a true and correct copy of joint hearing Exhibit 132.
- 89. Attached as Exhibit JJJJ is a true and correct copy of joint hearing Exhibit 136.
- 90. Attached as Exhibit KKKK is a true and correct copy of joint hearing Exhibit 137.
- 91. Attached as Exhibit LLLL is a true and correct copy of joint hearing Exhibit 138.
- 92. Attached as Exhibit MMMM is a true and correct copy of joint hearing Exhibit 139.

I declare under penalty of perjury that the foregoing is true and correct. Executed
on September 3, 2019 in New York, New York.

/s
VALDI LICUL